

1 County District Attorney since Lisa Liberi had an eight [8] year conviction in San
2 Bernardino County, California. Taitz in her e-mail informed Berg that she
3 believed that Berg, as an Officer of the Court, as well and a former Assistant
4 Attorney General of Pennsylvania, should join her in issuing a joint Complaint and
5 demand for investigation from the authorities. Taitz then forwarded the e-mail
6 addressed to Berg to an undisclosed number of recipients. Berg never received
7 Taitz's "Quo Warranto" from anyone.
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10 72. Liberi then received an e-mail from a third party, Ed Hale, claiming
11 Lisa Liberi was stealing money from Taitz's PayPal account. Mr. Hale's e-mail
12 was forwarding the April 12, 2009 email sent to Berg to Ceize [sic] and Desist
13 which Taitz sent out by mass emailing. In Taitz's email she falsely claims Liberi's
14 husband was on "parole" and had two (2) accounts accepting donations on Berg's
15 website, which was completely false. At all times, Taitz and Mr. Hale were well
16 aware this information was false and untrue. Taitz's email was also placed on Ed
17 Hale's website.
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19 73. Berg does not have a charitable foundation website. He does have a
20 website with a donation button which allows people to donate one (1) of two (2)
21 ways, PayPal or by a separate credit card company, which Berg is the only party
22 with access.
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1 74. Moreover, Liberi had nothing to do with the web-mastering of his
2 (Berg's) website, Taitz website or any other website. The coding for the donate
3 buttons and the accounts which donations go into are all done by a third party
4 webmaster and is all traceable. In addition, Liberi did not and does not fundraise
5 for Berg, as falsely claimed by Taitz. Nor had Liberi been to Taitz's website prior
6 to April 17, 2009 when Taitz put out Dossier #6.

7 75. Plaintiffs learned Orly Taitz had people go onto among others, Berg's
8 website at obamacrimes.com, download all the briefs investigated and prepared by
9 Berg and his assistant, copy the contents and Taitz then filed the briefs in Court
10 claiming the work to be hers, again which is plagiarism of Berg's and Liberi's
11 work, which is owned by the Law Offices of Philip J. Berg.

12 76. On or about April 14, 2009, Liberi received an e-mail from a third
13 party that contained a post on Plains Radio owned by Mr. and Mrs. Hale,
14 associates of Orly Taitz. The post was made by "Katy" and states Katy received
15 an e-mail from Taitz falsely claiming her PayPal account had been "hacked" and
16 falsely accusing Ostella of tampering and interfering with her donations and
17 website. The post also gives the FBI information as to who Taitz by and through
18 the Law Offices of Orly Taitz reported her false accusations to. This same e-mail
19 was also sent to an unknown number of undisclosed recipients.

1 77. April 15, 2009, Taitz sent a Letter to the FBI and Department of
2 Justice filing criminal complaint against Ostella claiming Ostella was stealing from
3 her.
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5 78. Again, Taitz was aware all this information was false. Ostella is a
6 Webmaster by trade. Taitz was maliciously slandering and posting libel about
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8 Ostella to punish and harm Ostella for telling the truth.

9 79. April 14, 2009, Taitz by and through the Law Offices of Orly Taitz
10 was on a blog talk radio station, Dame Central & Dr. Kate, which is an Internet
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12 blog talk radio program. The entire time Taitz was on the air she did nothing but
13 ridicule, make false statements, persecute, and disclose private facts about Liberi.
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15 80. On or about April 17, 2009 at approximately 9:31 a.m. Taitz sent out a
16 mass e-mailing of false statements in a document Taitz called "Dossier #6",
17 pertaining to Liberi, Ostella, Berg and the Law Offices of Philip J. Berg. Taitz
18 published personal identifying information regarding Liberi including her full
19 Social Security number, date of birth, residence information, her husband's partial
20 Social Security number and date of birth along with an altered and fabricated
21 article pertaining to Lisa Liberi (the emails which Taitz received from Sankey and
22 The Sankey Firm). Taitz made many false statements including but not limited to
23 the following: Ostella locked Taitz out of her website instead of transferring the
24 access codes and domains; Ostella posted bizarre defamatory statements that Taitz
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1 authorized hacking into her own account; Taitz claimed she received reports that
2 some defamatory comments were made under alias usually used by Lisa Liberi;
3 Taitz insinuated Ostella was taking monies donated to her; Liberi had an extensive
4 criminal record going back to 1990; Liberi, among other things, engaged in
5 falsification of police reports, manipulation of credit bureau reports; counterfeiting
6 of Court documents; Liberi had to pay Twenty-One Thousand [\$21,000] Dollars
7 per month in restitution; Liberi launched vicious attacks against Taitz and then
8 states Liberi disagreed with her and this was the vicious attack.
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12 81. Taitz's Dossier #6 incited violence against Liberi, Ostella and Berg
13 inferring that they were "obots", President Obama's supporters and needed to be
14 "purged".
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16 82. Dossier #6, by Taitz own admission, was an open letter posted on the
17 internet and forwarded to 26,000 outlets of US and international media on April
18 17, 2009. In addition, Taitz sent this e-mail to an unknown number of undisclosed
19 recipients asking them to post the information on their website.
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22 83. Moreover, Taitz by and through the Law Offices of Orly Taitz sent
23 this Dossier #6 to Attorney General Eric Holder; Solicitor General Elena Kagan;
24 Director of FBI Robert Mueller; FBI Cyber Crime division, Orange County CA,
25 Officer Nathan Le; Director of Secret Service Mark Sullivan; Chief of Security of
26 the Supreme Court, Officer Christine Giaccio; Chief Justice of the Supreme Court
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1 John Roberts; and Legal Counsel to the Chairman of Joint Chiefs of Staff Admiral
2 Mullen, Captain Crawford. Taitz sent out thousands of emails to a hundred
3 recipients at a time on numerous occasions and dates, including internationally.
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5 84. Taitz continued reposting and republishing her Dossier #6 on her
6 website and on the Internet which was set to refresh every three (3) hours; and was
7 sent out through numerous RSS feeds to an unknown amount of third party
8 websites and individuals. Thus, millions of individuals received Dossier #6,
9 including internationally with Liberi's private primary identification information.
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11 Taitz continued republishing Liberi's Social Security number and other primary
12 identification information on the Internet millions of times. In fact, Taitz's Dossier
13 #6 is still online with Liberi's full Social Security number, date of birth and other
14 private data.
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17 85. In or about 2011, Taitz has again republished Dossier #6 on her
18 website, this time removing the last four (4) of Liberi's Social Security number.
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21 86. On April 17, 2009, Taitz filed a false police report with the Orange
22 County Sheriff's Department against Liberi and Ostella claiming they were the
23 same person and had stolen Ten Thousand [\$10,000.00] Dollars from her.
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26 87. Taitz continued posting on her website at numerous different places,
27 sending by mass emailing, postal mailing false statements, including but not
28 limited to Liberi had a long criminal "rap sheet"; that Ostella was stealing monies

1 from her; that Liberi and Ostella were diverting funds from DOFF; that Liberi and
2 Ostella “hijacked Taitz blog/website”; that Liberi had been convicted of document
3 forgery; that Liberi was a career forger; that Liberi had current criminal charges
4 against her; that Liberi murdered her sister; that Liberi was in violation of her
5 probation; Taitz continued posting on her website encouraging her readers and
6 supporters to file law enforcement reports against Liberi and Ostella based on Taitz
7 false allegations; that Liberi, Ostella and Berg were harassing her (Taitz);
8 encouraging her readers and supporters to call the Probation Departments in San
9 Bernardino County, CA and Santa Fe, NM to have Liberi arrested; illegally
10 publishing Liberi’s family photo; illegally publishing a picture of Liberi claiming it
11 was a “mug shot”; falsely accusing Ostella of having a criminal record; falsely
12 accusing Liberi of being convicted of crimes she had never been convicted of;
13 falsely accusing Liberi’s husband of crimes; that Liberi, Berg and Ostella were
14 slandering, libeling, defaming and committing crimes against her (Taitz); giving
15 private information regarding Liberi and Ostella, including maiden names,
16 mother’s maiden names, address information, asking her supporters and readers to
17 pull additional information on Plaintiffs, including voter records, Social Security
18 numbers, past addresses, cyber-stalking; cyber-harassing; and cyber-bullying
19 Plaintiffs; Taitz continued asking her readers and supporters for help with Liberi
20 and Ostella; and many other private and false statements which constitute cyber-
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1 stalking, cyber-harassment and cyber-bullying. Taitz continued her false
2 publications over and over again, all of which are still on the Internet.
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4 88. Taitz has published on her website just about every pleading she has
5 filed with the Court in the within case, which contains many false statements, false
6 allegations, false stories, altered documents, and other inappropriate things, as if it
7 is true.

8 89. June 10, 2011 Taitz posted a copy of her pleadings filed in this Case,
9 appearing as Docket No. 224, which contain many false statements, forged/altered
10 documents, and does not pertain to the case whatsoever. Defendant Orly Taitz,
11 Esquire used the Court's docketing system to further her attacks on Plaintiffs Lisa
12 Ostella and Lisa Liberi to harm and damage Plaintiffs. This is also further cyber-
13 stalking, cyber-bullying, and cyber-harassment as well as other illegal damaging
14 torts explained herein. Taitz then posted this on numerous social networks and all
15 over the Internet, including but not limited to Taitz's Facebook pages, "before its
16 news" social network; on Taitz's Friends Feed social network sites, etc. In these
17 posts, Defendant Orly Taitz, Esquire admits that the private data she obtained was
18 obtained from the Reed Defendants (LexisNexis and ChoicePoint, Inc.).
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20 90. On or about June 12, 2011, Taitz conducted an interview with the post
21 and email. The interview is posted on the interviewer's website. Defendant Taitz
22 falsified numerous stories about Plaintiffs Lisa Ostella and Lisa Liberi. Taitz
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1 falsely states that Liberi was convicted of burglary; of 27 criminal counts; of
2 multiple forgery crimes; is a career document forger; that Liberi worked for Taitz;
3 that Liberi and Ostella replaced the PayPal account on Taitz website with theirs
4 (Lisa Liberi and Lisa Ostella's); that Liberi and Ostella stole from her; Taitz admits
5 to using LexisNexis and ChoicePoint; Taitz admits to knowing Liberi had and has
6 cardiac complications; etc. Plaintiff Lisa Liberi has NEVER worked for or had
7 anything to do with Orly Taitz. Plaintiff Liberi has not been convicted of burglary;
8 has not been convicted of 27 counts of any type of crime; has never been
9 convicted of forging documents; Liberi did not change any of Orly Taitz's PayPal
10 accounts; Liberi did not contact Orly Taitz to work with her or for her; Liberi did
11 not offer services to Orly Taitz; Liberi did not have anything to do with Orly
12 Taitz's website or blogs; etc. This news article was spread all over the Internet,
13 sent out in thousands of RSS Feeds; sent out via Twitter; Facebook; and Defendant
14 Orly Taitz's other social network accounts. Hundreds of other websites also
15 posted it on behalf of Defendant Orly Taitz, which is "Marketing" of the
16 confidential information pertaining to Plaintiff Lisa Liberi.

17 91. There are thousands of pages posted by Taitz and the Law Offices of
18 Orly Taitz on the Internet with false, deceptive stories about the Plaintiffs. Taitz
19 also continually republishes all of her Internet postings about the Plaintiffs,
20 including those with Plaintiffs private data. Taitz publishes her Internet postings in
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1 numerous locations of her blog so it will go out through more RSS Feeds and
2 continue circulating. Taitz also sent out her false postings and stories in mass
3 emailing; through Facebook, Twitter, Friends feed, and other social networks. All
4 posts are set to refresh on Taitz's site every three [3] hours which is republication
5 and the posts are resent out each time through numerous RSS feeds on Taitz sites.
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8 92. When Orange County Sheriff's Department closed Taitz false report,
9 Taitz demanded her false police report be transferred to the Santa Fe Police
10 Department where Taitz also made false reports about Lisa Liberi. In addition,
11 Orly Taitz made continued harassing calls to the Santa Fe Probation Department
12 demanding the arrest of Plaintiff Lisa Liberi and filing numerous false allegations.
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15 93. During this same time, Taitz began putting out a "supposed" criminal
16 rap sheet of Ostella and Liberi. Taitz stated Ostella and Liberi were the
17 same person and made reports to several agencies as such. Taitz used her
18 credentials as an Officer of the Court as well as Sankey's credentials of being a
19 former Scotland Yard Detective and a current licensed investigator to lend these
20 reports more creditability. Orange County Sheriff Department's Officer D.
21 Mendoza labeled these documents 'internet rap sheets' and found no credibility to
22 any of the information. Taitz sent these reports to the FBI with the same story.
23 Agent Nathan Le found no credibility to them. Taitz had these reports sent to
24 Santa Fe. Captain Wiggins found no credibility to them. Taitz personally brought
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1 these reports to North Brunswick Police Department [“NBPD”], further proving
2 she knew Ostella and Liberi were not the same people. NBPD found no credibility
3 to them. Taitz then sought out a Minister and Author and leveraged his
4 credentials to further disseminate these reports. Taitz enlisted followers to mail,
5 copy and meet with officials of several states to submit these reports which now
6 had many variations. Taitz filed these variations of these reports in Court dockets
7 to ensure permanent publication. Ostella and Liberi not only are not the same
8 person; but neither are convicted forgers, nor have ever stolen anything from
9 Taitz. Their bank records were reviewed by agencies of New Mexico as well as
10 New Jersey and were submitted to Judge Robreno as well as copied to Taitz.
11 Taitz, fully aware the law enforcement agencies found no merit to her allegations,
12 still to this day, reports Liberi and Ostella as committing crimes and presents and
13 reports on Ostella and Liberi as having this internet rap sheet, that was debunked
14 by several agencies as being untrue. Only now Taitz concedes that Ostella and
15 Liberi are separate persons.

16 94. Taitz was harassing the Santa Fe Police Department on her false
17 report demanding they arrest Liberi on the false charges made by Taitz of Liberi
18 “hacking” and “stealing” donations from her. The now Captain finally told Taitz if
19 she comes out to this state, he would arrest her. The Captain also told Liberi to
20 immediately file suit against Taitz and the Law Offices of Orly Taitz.
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1 95. Liberi was being harassed so severely by Taitz and the Law Offices of
2 Orly Taitz and because of their postings on the internet, Liberi began having heart
3 complications as a result of the stress. As a result, Liberi had to begin Enhanced
4 External Counterpulsation therapy (EECP), which cost approximately Sixty
5 Thousand [\$60,000.00] Dollars, in attempts to get a better blood flow to her heart.
6 Stress restricts blood arteries and vessels to the heart, and Liberi had suffered three
7 (3) previous heart attacks, and open heart surgery.

8 96. On May 27, 2009 in the middle of the night, Ostella received three [3]
9 consecutive payment requests through PayPal from a Ruben Nieto attempting to
10 get paid by Taitz and Defend our Freedoms Foundations, Inc. The three [3]
11 payment requests totaled Twenty-Five Thousand [\$25,000.00] Dollars. Each
12 payment request was under the Ten Thousand [\$10,000.00] Dollars mandatory
13 reporting pursuant to the Patriot Act. Ruben Nieto also requested payment again
14 on May 29, 2009. The only reason Ostella received these money requests is
15 because Ostella's email address was set-up in Taitz's PayPal account as the
16 customer service representative for Taitz and Taitz never removed Ostella's email
17 address. Ostella only received notices of payment requests and donations; it did
18 not give Ostella access to Taitz's PayPal account.

19 97. Plaintiffs ran Nieto's email address through Spokeo.com, a search
20 engine of social network sites. This in turn gave websites owned by Nieto and
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1 where Nieto resided. Nieto resides in Albuquerque, NM, forty-five [45] minutes
2 from Liberi's home. Nieto's name and date of birth was run through Court records
3 and it was found that Nieto had been convicted of violent crimes, including
4 Aggravated Assault. Nieto is not an attorney, a private investigator or of any trade
5 in which a law firm would utilize his skills and pay Twenty-Five [\$25,000.00]
6 Dollars. Therefore, it appears, and Plaintiffs believe, Taitz by and through the Law
7 Offices of Orly Taitz attempted to hire an individual in close proximately of Liberi
8 to carry out their threats and have Liberi, Ostella and/or their families harmed.
9 Plaintiffs are unsure whether Nieto was ever paid. Taitz cancelled the PayPal
10 requests for payment from Nieto.

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12 98. On May 28, 2009, Taitz filed in this case a pleading that had
13 information about Liberi's son, including where Liberi's son had been, where
14 Liberi's son traveled to, and private data relating to Liberi's son. See this Court's
15 Docket Entry No. 36 filed May 28, 2009.

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17 99. On May 28, 2009 Neil Sankey went on Plains Radio Network, a radio
18 station through the blog and through AM/FM towers hosted by Edgar Hale. In this
19 radio appearance, Sankey states Liberi had 200 criminal counts against her for
20 buying and reselling the same house; that people in San Bernardino, CA were still
21 looking for her and when the time is right, he will provide Liberi's location; the
22 discussion regarding Liberi just taking a loan out was raised by Ed Hale, Sankey
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1 hemmed and hawed and stated he was still looking into that. Liberi had just taken
2 out a loan for her son's college and the only way Sankey would have known that
3 was by pulling an illegal credit report on Liberi. Sankey then stated that the
4 lawsuit against him was going to go away, he didn't know how much it would
5 cost but he was told it was going to go away.

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7 100. On June 10, 2009 Taitz went on a television program, *Nightlights in*
8 *San Diego* with James Lamberg. This television show airs on Cox Cable (SD)
9 telecasts every Sunday night at 8:30, channels 18 and/or 23. Taitz was
10 encouraging everyone to go to her website and download Dossier #6, which
11 contains Liberi's primary identification information. Taitz talks about Liberi
12 having a conviction, persecuting and degrading Liberi and making false
13 accusations about Liberi.
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15 101. In or about May/June 2009 Ostella received calls from Taitz's
16 supporter warning Ostella that Taitz had threatened to have Ostella's children
17 professionally kidnapped. Ostella immediately reported this to the North
18 Brunswick Police Department. Thereafter, on June 25, 2009, after a Court Hearing
19 in this case, Taitz and her law clerk, Charles Edward Lincoln, III drove around
20 New Jersey where Ostella and her family resides and where her children attend
21 school. The Ostella's immediately sold their house and moved due to fear. Dr.
22 Lincoln provided an Affidavit which is on file with this Court and appears as
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1 Docket Entry No. 154, filed on or about December 10, 2010. Shortly thereafter, a
2 picture of Ostella's daughter, while at school by the parking lot, was placed on the
3 internet. This was immediately provided to the Denville Police Department (since
4 they now no longer lived in North Brunswick), along with Dr. Lincoln's Affidavit
5 once it was received. The Sergeant handling the case was extremely concerned
6 and turned it over to the Newark Federal Bureau of Investigations for full
7 investigation. In addition, Ostella's family rabbits were slaughtered, and the
8 innards (the guts) were placed on Ostella's deck for her children to find. This
9 crime was also reported to the Denville Police Department.

102. Shortly after, a woman began contacting Ostella claiming to be her
11 biological mother. This woman called Ostella during Ostella's move, and told her
12 that she was watching Ostella live as her (Ostella) and her family was moving.
13 Just recently, this woman mailed a card to Ostella telling her that she was going to
14 be in town for Ostella's daughter's birthday. The problem, Ostella never gave this
15 woman her phone number, address, children's birthdates, the fact she was moving,
16 her new address, nothing. Ironically, the woman has been calling from Orange
17 County, California, where Taitz resides and where Orly Taitz, Inc., DOFF and the
18 Law Offices of Orly Taitz are located.

103. On or about September 21, 2009 Taitz filed her Dossier #6 with
11 Liberi's Social Security number partially redacted; Liberi's date of birth; and other
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1 private identifying information in the Federal ECF filing system, in a case entitled
2 “*Barnett, et al v. Obama, et al*, U.S.D.C. Central District of CA, Southern
3 Division, Case No. 8:09-cv-00082 before Judge Carter. A case completely
4 unrelated to Liberi. Due to the confidential and private information contained in
5 Taitz’s Dossier #6, Berg sent a letter to Judge Carter asking him to seal this
6 particular document, Dossier #6. On September 30, 2009, Judge Carter Ordered
7 Dossier #6 in Taitz’s filing Sealed and Ordered Taitz to refile her documents with
8 all private data excluded. Judge Carter’s Order appears as Docket Entry No. 114
9 filed in this case on October 6, 2009 with Plaintiffs request for the Court to take
10 Judicial Notice.
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12 104. In or about the end of September 2009, Larry Sinclair contacted Liberi
13 and told her that Taitz was accusing her of murdering her sister; Taitz stated that
14 everyone knew it, including law enforcement, but couldn’t prove it and Taitz was
15 accusing Liberi of tampering with her (Taitz’s) car. In turn, Liberi asked Mr.
16 Sinclair for an Affidavit, which Mr. Sinclair supplied the Law Offices of Philip J.
17 Berg. Mr. Sinclair’s Affidavit is on file with this Court. *See* Docket Entry No. 112
18 filed September 30, 2009. Mr. Sinclair’s Affidavit in this Case includes the
19 Affidavit in which he submitted to Judge Carter.
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1 105. After Judge Carter sealed Taitz filing containing Taitz's Dossier #6,
2 Taitz sent a letter to Judge Carter asking for immediate investigations into Mr.
3 Smith, Mr. Sinclair, Mr. Berg and Liberi. Taitz posted this on their website.
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5 106. In or about January 2010, the Gas Company appeared at Liberi's
6 home. Liberi's husband was home for lunch during this time. The gas man came
7 to the Liberi's door, as cars were in front of her garage. It was during one of the
8 heaviest snow storms. The gas man stated he was there to turn off the Liberi's gas.
9 The Liberi's asked why, the gas man said that Lisa Liberi called in and gave all the
10 personal identifying information on the account and scheduled the gas to be turned
11 off. The Liberi's explained to the gas man that Lisa Liberi did not call. The gas
12 man stated that the woman who identified herself as Lisa Liberi had Lisa and Brent
13 Liberi's Social Security numbers and provided them to the tech for the disconnect.
14 Liberi called the gas office while the gas man was there and placed a password on
15 their account. This was not the first time this had occurred. Someone posing as
16 Lisa Liberi also called AOL and cancelled Liberi's AOL account. Liberi lost eight
17 (8) years of stored email.
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19 107. At the end of 2009, Liberi and her husband began receiving letters for
20 credit they had opened. Everything from credit card accounts, loans, car loans, etc.
21 Liberi and her spouse did not apply for the credit. Liberi began calling the
22 companies having the accounts closed. Liberi and her husband than began
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1 receiving collection notices for accounts they did not open and were completely
2 unaware of. Liberi and her husband ordered their credit reports only to learn
3 numerous people had been using their identities. They found addresses in Texas,
4 Iowa, California, Massachusetts, and more. Liberi and her husband did not reside
5 in any of these states or at the addresses shown on their credit reports. Liberi
6 immediately reported it to her local police department. The officer took the report
7 as Identity Theft, and listed Orly Taitz and Neil Sankey as the perpetrators. This
8 report was forwarded to the Orange County Sheriff's Department. Ostella and her
9 husband had multiple small internet companies automatically debiting their
10 accounts, receiving loan referrals from people they don't know and had to cancel
11 their card. It was also discovered that a website/blog was set-up fraudulently in
12 Liberi's name and the charges were illegally charged to her credit card.
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14 108. Liberi and her husband spent countless hours and days writing to all
15 the company's, the credit bureaus and collection agencies regarding the fraudulent
16 accounts. Once cleared up, it began happening over and over again.
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18 109. During this same time, people began coming to Liberi's home. Liberi
19 refused to answer the door as she did not know who these individuals were. In
20 particular, a man appeared before 8:00 a.m. Liberi was on the phone with Ostella,
21 the man began banging at Liberi's door, and then scrambled Liberi's phone. Liberi
22 could not disconnect her phone. Liberi ran and woke her son up; he too heard the
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1 loud screeches, as did Ostella. Liberi attempted to use her cell phone to call the
2 police; but, her cell phone was blocked also. This man, who was wearing Levi's, a
3 grey t-shirt, a grey ball cap and drove a white newer model outback, began looking
4 in Liberi's house windows. The man finally left and Liberi immediately reported
5 the incident to her police department. Liberi contacted her husband and he came
6 home from work and stayed home the rest of the day out of concern for Liberi's
7 safety and medical conditions as Liberi was so upset and scared.
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10 110. Liberi was also receiving non-stop phone calls ridiculing and
11 threatening her. People were calling Liberi's home telling her if she did not drop
12 the suit against Taitz then she would meet her maker soon. Liberi was receiving
13 tons of hang up calls, Liberi would answer her phone and the people would hang
14 up on her. There were so many calls coming in every day, one day Liberi was at a
15 doctor's appointment, she was gone a couple of hours, when she returned home,
16 her message machine was full. Ostella received numerous calls from people
17 claiming to be cyber-crime investigators and were being sent to investigate the
18 theft of Taitz's foundations as well as various other threats.
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20 111. Taitz and Sankey both admit they sought out John Mark Allen,
21 Liberi's son's father who Liberi and her son were protected from, and claim they
22 obtained Liberi's family photo from him. This is impossible; Mr. Allen never had
23 the picture. The picture was taken in 2006; Mr. Allen had been restrained from
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1 Liberi and her son since 2002. The family photo was only located on Liberi's
2 home computer. Further, when Taitz and Sankey sought out Mr. Allen, the
3 restraining order was still in full force and effect. Taitz and Sankey also gave
4 Liberi's location and address to Mr. Allen, further endangering Liberi and her
5 family. Liberi and her son were placed in a safe at home program and given a
6 confidential address, which Taitz violated and destroyed.
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8 112. In or about May 2010, Plaintiffs Ostella and Liberi began finding
9 "cookies" as well as "access tokens" on their computers from a variety of the
10 Defendants, including but not limited to Orly Taitz, Yosef Taitz, Reed Elsevier,
11 Accurint, etc. In particular was the access token placed on Plaintiffs computers
12 from Orly Taitz. *See* Orly Taitz's access token placed on Plaintiffs computers. An
13 access token is used for a third party to be able to access and transfer data from the
14 computer the access token is located on. Plaintiffs have never authorized access to
15 their computers by any of the Defendants.
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17 113. Taitz as an Attorney filed Liberi's family picture in this case on July
18 29, 2010, Docket No. 136-1; August 2, 2010, Docket No. 138; September 18,
19 2010, Docket No. 143-1; and September 28, 2010, Docket No. 145.
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21 114. August 30, 2010, Orly Taitz by and through the Law Offices of Orly
22 Taitz went on the Andrea Shea King radio show at 9:00 PM. The Radio Show is
23 named "**Orly Taitz has a few things to say about foreheads and birth**
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1 certificates. Tonight she joins us to tell us what they are". At 49:47 into the
2 interview, Taitz states "Let me tell you what Phil Berg did...What he is doing is
3 absolutely criminal. And you can read this on my website as well. Phil Berg has a
4 paralegal, a woman by the name of Lisa Liberi. And this woman has a lengthy
5 criminal record. I know of 43 criminal charges and at least 10 criminal
6 convictions. Just recently, in 2008, this woman was convicted...And Philip Berg,
7 Lisa Liberi, and another woman, Lisa Ostella; ...just united and uh, originally
8 Ostella locked me out of the website of my foundation...she continued writing
9 letters to the donors and asking them to donate and she was deferring funds from
10 my foundation into her own pocket ... I written to Philip Berg and I stated look,
11 this is theft. That is stealing from my foundation. You need to stop the patronage
12 of this person she is deferring funds from my foundation illegal by virtue of fraud
13 here is the rap sheet of your own assistant, this Lisa Liberi who is in control of
14 everything Philip Berg is doing, and she has a lengthy record of forgery of
15 documents and grand theft. ..But I guess he knew that what he did was illegal
16 and...he thought he would be caught. He ...filed a lawsuit against me... Against
17 Neil Sankey, a top notch private investigator who was the first one to find all of
18 this information on social security numbers. ..I'm sorry but this woman Lisa Liberi
19 supposed to be back in prison and what Phil Berg is doing is criminal... and he
20 stated that this Lisa Liberi is not the same Lisa Liberi who was convicted. And I
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1 *have provided directions, I have provided the pictures. Here's her picture that*
2 *came from her boyfriend:*" [emphasis added] "He knew he is committing fraud on
3 the court, perjury, they have been submitting forged documents, he has been
4 intimidating witnesses, engaging in obstruction of justice, he written pleadings to
5 where he accused Pamela Barnett, a war hero and a officer...Without a shred of
6 evidence he accused her of forging documents." All of this is untrue. Directions
7 can be to do something or to locate something. None of the Plaintiffs have ever
8 accused Pamela Barnett of forgery. What Plaintiffs filed in Court was that Taitz
9 orchestrated the falsified letters submitted by Linda Belcher and either Pamela
10 Barnett or Mr. Murray was who created the falsified letters for Linda Belcher to
11 sign. It was later learned it was in fact Mr. Murray, Taitz's assistant. Taitz
12 continues her interview falsifying what is on file with the Court in this Case; what
13 Plaintiffs said, filed, etc. Taitz then asks if something happened to Liberi's son.
14 Taitz also published this on her website entitled "I am doing Andrea Shea-King
15 show today at 5PST / 8 EST. This radio interview is also located on the internet on
16 the blog talk radio website.

17 115. During this time, Taitz along with her supporters were harassing and
18 threatening the Santa Fe Probation Department, the San Bernardino County
19 Probation Department; and the San Bernardino County District Attorney's Office.
20 In fact, Neil Sankey contacted the Santa Fe Probation Department and spoke to
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1 Patricia Vigil-Bartram claiming to work for the Law Offices of Orly Taitz and
2 calling on behalf of Orly Taitz seeking information regarding Liberi claiming to be
3 a “victim” of the crime which placed Liberi on Probation. Taitz is not new to
4 these types of fraudulent practices. Sankey made all types of false allegations
5 against Liberi claiming she was around other’s credit cards; she was fundraising;
6 she was committing perjury, forgery, etc. In fact, it was Taitz who was collecting
7 credit cards and had an individual who had been convicted of theft handling the
8 credit card information. *See* the Affidavit of Lisa Ostella filed October 7, 2010,
9 appearing on this Court’s docket as Docket No 146-4.

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13 116. Taitz then sent a package to the Santa Fe Probation Department which
14 contained only Taitz’s Court filings and Forged and Altered emails bearing
15 Liberi’s name. (These forged emails are on file with this Court, filed by Taitz and
16 her witness, Geoff Staples appearing numerous times, in particular as Docket Entry
17 No. 145 filed September 28, 2010; April 26, 2011 as Docket Entry No. 178; and on
18 June 10, 2011; Docket No. 224.
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22 117. Taitz continually filed this picture of Liberi, which Taitz calls a “mug
23 shot” numerous times in this case, see October 21, 2010, Docket No. 147; October
24 28, 2010, Docket No. 149; February 1, 2011, Docket No. 165; April 18, 2011,
25 Docket No. 175; April 26, 2011, Docket No. 178; June 10, 2011, Docket No. 224;
26 as well as the numerous letters sent to Judge Robreno by Taitz that were never
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1 filed. In addition, Taitz also filed with this Court, numerous times, the document
2 which she calls a “rap sheet” and in other places she calls a “Court print-out”, see
3 May 28, 2009, Docket No. 35; May 28, 2009, Docket No. 36 (this filing by Taitz
4 also includes Liberi’s full Social Security number); May 28, 2009, Docket No. 48;
5 June 9, 2009, Docket No. 53; June 14, 2010, Docket No. 121 (this filing by Taitz
6 also includes Liberi’s full Social Security number); July 29, 2010, Docket No. 136
7 and 136-1; August 3, 2009, Docket No. 91; August 3, 2009, Docket No. 93-1;
8 February 1, 2011, Docket No. 165; April 18, 2011, Docket No. 175; April 26,
9 2011, Docket No. 178; June 10, 2011, Docket No. 224 and in numerous letters
10 Taitz sent directly to Judge Robreno which were not filed on the Docket. In turn,
11 Orly Taitz posted all her filings on the Internet and sent them by mass email.
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13 118. Liberi’s pictures and “supposed” rap sheet were also filed in the Case,
14 Lincoln v. Daylight, et al, Case No. 8:10-cv-01573-AG -PLA, a case completely
15 unrelated to Liberi. *See* January 9, 2011, Docket No. 24; January 27, 2011, Docket
16 No. 30; February 15, 2011, Docket No. 43; and February 28, 2011, Docket No. 51.
17 Taitz also filed in the case of Rivernider, et al v. U.S. Bank, U.S. District Court,
18 Southern District of Florida, Case No. 9:09-cv-81255-WPD, another case
19 completely unrelated to Liberi. *See* Taitz filings of January 29, 2010 appearing as
20 Docket No. 56. All of these Court filings were also published all over the Internet
21 by Defendant Orly Taitz.
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1 119. As this Court is aware, the repeated publication of Defendants false
2 statements evidence malice. *See Fisher v. Larsen* (1982) 138 Cal. App. 3d 627,
3 640 [188 Cal. Rptr. 216]; Rancho *La Costa, Inc. v. Superior Court* (1980) 106 Cal.
4 App. 3d 646, 667 [165 Cal. Rptr. 347]. The repeated filing in the Federal
5 Docketing System is repeated publication as are Taitz's continued posting on her
6 website. In *Evans v. Unkow*, (1995) 38 Cal. App. 4th 1490 [45 Cal.Rptr.2d 624]
7 The court held, "*On the first point, it is true that reliance solely on "a source*
8 *known to be hostile" toward the Plaintiff may support a finding of reason to doubt*
9 *the source's veracity, and hence constitutional malice*" quoting *Fisher v. Larsen*
10 (1982) 138 Cal.App.3d 627, 640, [188 Cal. Rptr. 216]; and *Reader's Digest Assn.*
11 *v. Superior Court* (1984) 37 Cal.3d 244, 258, [208 Cal. Rptr. 137, 690 P.2d 610].
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13 120. Taitz by and through the Law Offices of Orly Taitz was harassing the
14 police department and probation department where Liberi resided nonstop. Taitz
15 also had her supporters, readers and followers calling and harassing these
16 departments. Liberi was also being harassed. It was so severe, that Liberi had
17 heart complications due to the stress caused by Taitz, the Law Offices of Orly
18 Taitz and by their actions, postings and inciting. Liberi went into tachycardia and
19 ended up in the hospital for approximately a week. Liberi was on heart monitors
20 and the doctors determined and documented that the heart complications were
21 caused by the severe stress Liberi was forced to endure due to Taitz actions and
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1 behaviors. Thereafter, Liberi was placed on valium in attempts to keep her calm
2 and again had to go through EECP. Liberi's medical records for the medical
3 treatments outlined above and this hospitalization, were supplied to Judge Robreno
4 on December 20, 2010.

5 121. In November 2010, Liberi received an email as did many individuals
6 in Liberi's AOL address book, which stated "love your new website". It was
7 discovered that a website/blog had been fraudulently set-up in Liberi's name.
8 Liberi has never owned a blog or a website. The domain was privately registered.
9 This website contained the single photo of Liberi that Orly Taitz and the Law
10 Offices of Orly Taitz had been publishing all over the internet and filing with this
11 Court as Liberi's "Mug Shot". It was apparent that the picture of Liberi came from
12 Orly Taitz to be put up on this website. This website also contained sexually
13 enticing statements, and sexual content as well as private documentation which had
14 been sent to Judge Robreno in Pennsylvania. The confidential information to
15 Judge Robreno could have only been supplied by Orly Taitz and the Law Offices
16 of Orly Taitz. The privacy was removed from the domain and it was discovered
17 the fraudulent website was established by and set-up by Geoff Staples, Taitz
18 follower, supporter and witness, who forged documents in Liberi's name, in this
19 case. All of the postings appeared to be coming from Liberi. There were several
20 other email addresses also set-up in Liberi's name. Liberi never authorized anyone
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